



Joseph M. Kuo  
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September 26, 2024

**VIA ECF**

Judge James D. Peterson  
Chief U.S. District Judge  
U.S. District Court  
Western District of Wisconsin  
120 North Henry Street, Room 320  
Madison, WI 53703

RE: *SSI Technologies, LLC v. Dongguan Zhengyang Electronic Mechanical LTD*  
U.S.D.C. Western District of Wisconsin Case No. 3:20-cv-00019-JDP

Dear Your Honor:

This letter is in response to Mr. Merrill's request during the September 25, 2024, Final Pretrial Conference to provide clarification regarding PX141 (Freedom to Operate Opinion dated July 13, 2018). More particularly, to advise the Court whether PX140 (Sherman Group search) and PX142 (Freedom to Operate Ultrasonic Concentration search spreadsheet) were provided to Aaron Irvin, the recipient of the Freedom to Operate letter that is PX141.

I confirm that PX140, PX141, PX142 were attachments to a cover email sent by me to Mr. Irvin on May 31, 2018. In other words, all three of these exhibits were sent to Mr. Irvin together.

After PX140, PX141, and PX142 were produced following your summary judgment decision of May 23, 2024 (Dkt. 239), Plaintiff's counsel requested production of my cover email, and it was produced as DZEM\_151060, a copy of which is attached.

Sincerely,

/s/ Joseph M. Kuo

Joseph M. Kuo

cc: All Counsel of Record

Attachment

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**From:** Kuo, Joseph M.  
**Sent:** Thursday, May 31, 2018 11:40 AM  
**To:** Aaron Irvin (aaron.irvin@kus-usa.com)  
**Cc:** Yale Huang (yale.huang@kus-usa.com); Kang, Anthony  
**Subject:** TQS Ultrasonic Sensor Device - Freedom to Operate Opinion [IWOV-Active.FID3528975]  
**Attachments:** TQS Freedom To Operate.pdf; Freedom to Operate - Ultrasonic concentration detector - (IWOV-Active.FI....xlsx; Patent References.zip

Dear Mr. Irvin,

Please see attached correspondence and attachments.

Very truly yours,

Joseph Kuo

**SAUL EWING**  
**ARNSTEIN**  
**& LEHR** LLP

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